

Exhibit B



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November 21, 2019

BY EMAIL

Richard Cooper
Daniel Tracer
United States Attorney's Office
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

Re: *United States v. Nikas et al.*, 1:19-cr-00716

Dear Messrs. Cooper and Tracer:

Please produce immediately the records referred to in the following paragraph of your discovery letter of today:

We wish to advise you that records provided to the Government by Investment Bank B, as identified in the Indictment in this case in connection with the Corporate Acquisitions Insider Trading Scheme, reflect that the individual identified in the Indictment as CC-2 accessed files relating to Baxalta on the computer systems of Investment Bank B on approximately twelve occasions, from approximately April 2015 through July 2015. Those records reflect that on or about July 27, 2015, CC-2 accessed files relating to Baxalta's potential acquisition of Ariad on the computer systems of Investment Bank B.

These records are exculpatory evidence pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963). The defense is entitled to them immediately. In addition, please immediately produce any other documents in the government's custody related to CC-2, Investment Bank-B or Baxalta.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon R. Streeter", with a long, sweeping horizontal line extending to the right.

Jonathan R. Streeter

cc: Eric Sussman and Jennifer Achilles